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September 8, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)  
c/o U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Comments on Draft Plan of Action

To Whom It May Concern:

The Ohio Farm Bureau Federation (OFBF) would like to thank you for the opportunity to review and submit comments on the Draft Plan of Action for Reducing, Mitigating and Controlling Hypoxia in the Northern Gulf of Mexico.

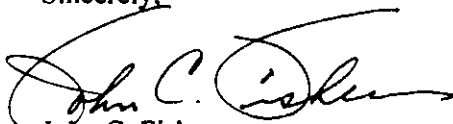
The Ohio Farm Bureau Federation is a grassroots organization of more than 207,000 members in the state of Ohio. We support reasonable efforts and needed research to address issues such as water quantity and quality, air quality, and the adoption of best management practices.

As per the published Notice of Availability and Request for Comment on Draft Plan of Action, we have performed our review and presented our attached comments based on the following:

- 1.) Which of the "Coastal Goals" should be in the final Action?  
Are the "Within Basin" and "Quality of Life" Goals appropriate or how should they be modified?
- 2.) Are the Implementation Actions listed and the dates associated with them appropriate?
- 3.) Provide examples of any effective nutrient management State/Tribal program successes or challenges which can be highlighted in the final Action Plan; and
- 4.) Are the listings of Federal programs in the section "Funding the National Effort" complete?

Feel free to give Larry Antosch of my staff a call, at 614-677-8773, if you have any questions regarding our comments.

Sincerely,

  
John C. Fisher  
Executive Vice President

JCF/lma

Attachment

FARM BUREAU MISSION

To improve rural standards of living, increase net farm income and protect personal property rights.

Comments on Draft Plan of Action for Reducing, Mitigating and Controlling  
Hypoxia in the Northern Gulf of Mexico

Ohio Farm Bureau Federation, Inc.

Goals of Action Plan

As is stated in the draft Action Plan:

“The complex nature of nutrient cycling and transport within the Mississippi and Atchafalaya River basins and Gulf of Mexico make it difficult to predict specific improvements in water quality that will occur both in the Gulf as well as the entire Mississippi River basin for a given reduction in nutrient loads. Further, it is clear that environmental responses to management actions in the basin likely will be slow, possibly requiring decades to demonstrate that remedial actions have helped the recovery of oxygen concentrations in the Gulf and have improved water quality in the Basin. Finally, while the current understanding of the causes and consequences of Gulf of Mexico hypoxia is drawn from a massive amount of direct and indirect evidence collected and reported over many years of scientific inquiry, significant uncertainties remain. Further monitoring, modeling and research are needed to reduce those uncertainties in future assessments and to aid decision making in an adaptive management framework. A comprehensive program of planning, monitoring, interpretation, modeling, and research to facilitate improvement in scientific knowledge and adjustments in management practices should be coupled to the initial nutrient management strategies identified in this plan. This adaptive management scheme involves continual feedback between interpretation of new information and improved management actions and is the key to targeting BMPs within watersheds where they will actually be effective.”

Given the current amount of uncertainty surrounding the prediction of specific water quality improvements for a given reduction in nutrient loads, the “Coastal Goal” in the final Action Plan should be more global in scope at this time. Coastal Goal 1.C “pursue practical, cost-effective efforts by all states and tribes within the basin and all categories of sources to protect the ecological and fisheries resources of the northern Gulf of Mexico by reducing nutrient over-enrichment” should be adopted. As the adaptive management process evolves, the Coastal Goal can and should become more definitive having measurable endpoints such as reducing the hypoxia impacted area to less than 5,000 sq km or reducing the annual nitrogen loading to the Gulf by 30 percent.

The present “Within Basin” and “Quality of Life” Goals in the draft Action Plan are appropriate as stated and do not need to be modified. As with the Coastal Goal, the Within Basin and Quality of Life Goals will also need to mature over time to contain measurable end points.

### Appropriateness of Implementation Actions

The short-term actions and time-frames that are proposed in the draft Action Plan fail to consider two very important actions that are currently taking place in the Mississippi River drainage basin, TMDL development and implementation and Source Water Assessment and Protection (SWAP) Program implementation. Both of these programs will be addressing water quality issues within and outside of the borders of each state in the basin. The attainment of water quality standards under TMDLs and the protection of public drinking water sources under SWAP will make great strides in reducing the nitrogen loads to the Gulf of Mexico. It only makes sense that, through the adaptive management process, these programs should be fully implemented and evaluated before any additional nitrogen load reductions are mandated.

It would be very reasonable to add an additional short-term action which evaluates the impact of each state's TMDL and SWAP program on the overall nitrogen load to the Gulf before the sub-basin nutrient reduction strategies are established. Federal financial and technical assistance should be dedicated to the implementation of TMDL and SWAP programs to help ensure that the voluntary implementation of best management measures takes place. At the same time, states will be evaluating and reissuing NPDES permits to support the implementation of TMDL and SWAP programs.

The remaining short-term actions and time-frames, while optimistic, appear to be appropriate.

### Example of an Effective Nutrient Management Program in Ohio

The State of Ohio was very effective in meeting its Phosphorus Reduction Goal for Lake Erie established in Annex 3 of the Great Lakes Water Quality Agreement of 1978 and the 1983 Supplement to Annex 3. The major focus of Ohio's plan was the acceleration of the voluntary adoption of conservation tillage. This effort has been well documented and published in numerous U.S. EPA publications.

### Listing of Federal Programs

The listings of Federal programs in the section "Funding the National Effort" appears to be complete.